

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 19-16896-PMM  
HAINES C. BROWN, IV and :  
KARYN P. BROWN, : Chapter 13  
Debtors. :

**DEBTOR'S RESPONSE TO MOTION OF EXETER FINANCE, LLC  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW come the Debtors, by and through their attorneys, Stephen M. Otto, Esquire and Law Office of Stephen M. Otto, LLC, and file the within Response, of which the following is a statement:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. After reasonable investigation, Debtors are without knowledge or information sufficient to form a belief as to the truth of the averment – Debtors cannot be certain whether Movant's calculation of the balance is accurate.
5. Admitted.
6. Admitted in part; Denied in part. It is admitted that Debtors have missed one or more payments; however, Debtors cannot be certain whether Movant's calculation of the arrearage is accurate.
7. Denied. Movant's averment is a legal conclusion to which no response is necessary.

WHEREFORE, Debtors request that this Honorable Court deny Movant's request.

Respectfully submitted,  
LAW OFFICE OF STEPHEN M. OTTO, LLC

By: /s/Stephen M. Otto  
Stephen M. Otto, Esq.  
833 N. Park Road Ste 206  
Wyomissing, PA 19610  
484-220-0481  
PA. I.D. No. 82463  
steve@sottolaw.com